

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 22-40 (JRT/LIB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**GOVERNMENT’S RESPONSE
TO DEFENDANT’S MOTION TO
TRAVEL**

(2) STEVE ANTHONY SHAND,

Defendant.

The United States of America, by and through its attorneys, Lisa D. Kirkpatrick, Acting United States Attorney for the District of Minnesota, Michael McBride, Assistant United States Attorney, and Ryan Lipes, Trial Attorney, opposes Defendant Steve Anthony Shand’s Motion to Travel to St. Ann Parish, Jamaica.

BACKGROUND

On November 22, 2024, after three days of testimony, Shand was found guilty of committing four offenses involving human smuggling. Specifically, conspiracy to bring aliens to the United States causing serious bodily injury and placing lives in jeopardy, Conspiracy to Transport Aliens Causing Serious Bodily Injury and Placing Lives in Jeopardy, Attempted Transportation of Aliens in the United States for the Purpose of Commercial Advantage and Private Financial Gain, and Aiding and Abetting the Attempted Transportation of Aliens for the Purpose of Commercial Advantage and Private Financial Gain. These offenses stemmed from the defendants’ months-long conspiracy to

smuggle dozens of people across an international border. Four of the defendants' smuggling trips successfully evaded detection and the final trip resulted in the deaths of four people.

As a result of his convictions, Shand now faces a term of imprisonment up to 50 years. His guideline sentence pursuant to the United States Sentencing Guidelines will likely exceed 78 months of imprisonment. Although he is a naturalized United States citizen, Shand was born and raised in Jamaica and still has family who reside there. A sentencing hearing is currently scheduled for March 31, 2025.

On January 16, 2025, Shand requested permission to travel to Jamaica to attend his mother's funeral. The funeral will occur on February 22, 2025. Shand's travel plans would have him travel outside the United States from February 20 to 24, 2025.

ARGUMENT

This Court should deny Shand's motion because it cannot take the risk he will attempt to evade punishment for his offenses. Shand successfully smuggled individuals across an international border on four occasions without being detected at great risk to himself. As part of his trial, he sat through extensive testimony by both United States and Canadian law enforcement agents concerning the investigative techniques and tools they use to detect and capture human smugglers. He has the knowledge and the experience to disappear into a foreign jurisdiction beyond the reach of United States authorities. He now faces the prospect of spending the rest of his life in prison, giving him a powerful motivation to do so. Moreover, once he enters Jamaica, United States authorities will have no ability or capacity to track his whereabouts and prevent his further travel. Should he

choose to do so, Shand could travel to another nation—potentially a nation without an extradition treaty with the United States—without detection. Although he has comported himself well while under pre-trial supervision, travel to a foreign jurisdiction is a risk this Court should not take.

CONCLUSION

For these reasons, the Government requests this Court deny Shand’s Motion to Travel.

Dated: February 4, 2025

Respectfully Submitted,

LISA D. KIRKPATRICK
Acting United States Attorney

s/ Michael P. McBride
BY: MICHAEL P. MCBRIDE
Assistant United States Attorney